



Cargill
I/T Services

EX-100-00000000


August 22, 2002

Re: *Ex parte* contact in CC Docket Nos. **96-45, 98-171, 90-571, 92-237, 99-200** and **95-1 16**; Universal Service Contribution Reform

Cargill, Inc. is pleased that the Commission is considering new methods for funding universal service. The current approach, which assesses contribution obligations based on interstate and international revenues, is uneconomic and therefore unsustainable, and should be replaced with a method that assesses contribution obligation based on lines and activated wireless numbers. Cargill, however, strongly objects to a recent proposal made by certain state regulators to freeze the assessments attributable to residential lines.

The Commission should replace the current revenue-based universal service surcharge with a more equitable charge that would apply to every customer's connection to the network – to residential and business lines on wireline networks and activated telephone numbers on wireless networks. **The** Commission has requested comment **on** a universal service funding plan that includes such line and number charges, proposed by a coalition consisting of The Ad Hoc Telecommunications Users Committee, AT&T, **e-TUG**, and WorldCom. Under this proposal, increases and decreases in universal service subsidies would be reflected in uniform percentage adjustments to all per line and wireless number charges. Cargill, Inc. urges you to adopt this connection-based proposal.

Cargill, Inc. also strongly objects to a recently filed proposal by certain state regulators that would be for five years the line and activated wireless number charges applied to residential and single line business customers. This proposal advances no legitimate public interest objective. Indeed, there is not a shred of evidence that proportionate increases in all line and number USF charges, if needed, would adversely affect residential telephone subscription levels or unfairly burden residential telephone service customers. The state regulators would subject business users alone to added subsidy burdens, burdens that could be quite substantial and that could undermine historic support for universal service subsidies.

Very truly yours,

Larry Gessini
Manager, Global Network Services

No. _____
Listed as _____

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ORIGINAL



August 22, 2002

Commissioner Kathleen Q. Abemathy
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex parte* contact in CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200 and 95-116: Universal Service Contribution Reform

Dear Commissioner Abemathy:

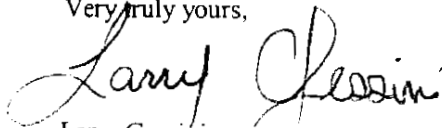
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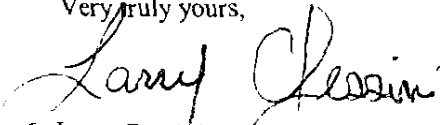
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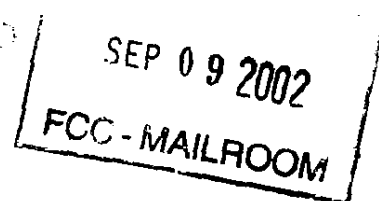
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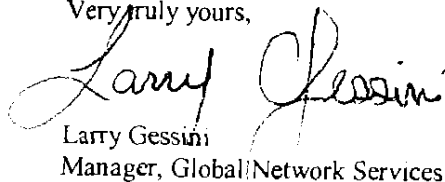
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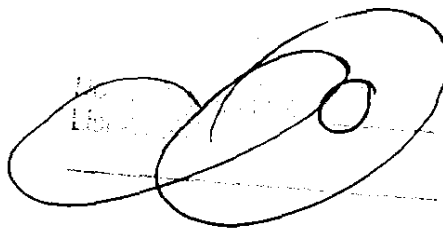
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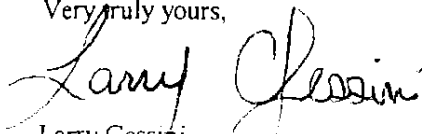
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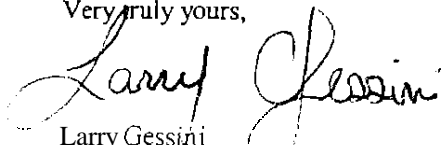
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